



Semiannual Remedy Selection Progress Report

Twin Oaks Power Station

PREPARED FOR
Major Oak Power, LLC

DATE
15 July 2026

REFERENCE
0809005

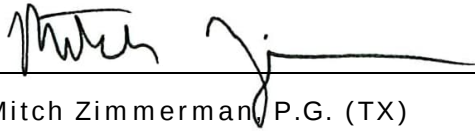


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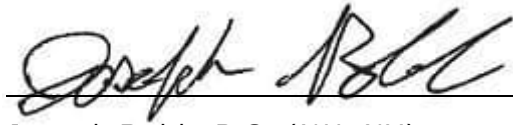
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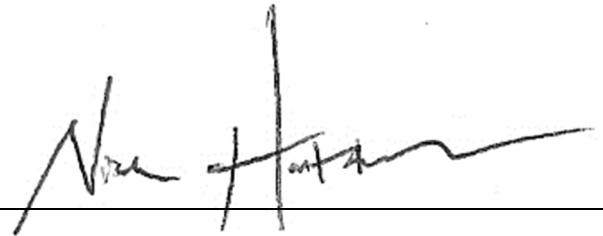
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1. INTRODUCTION

On behalf of Major Oak Power, LLC (Major Oak), Environmental Resources Management Southwest, Inc. (ERM) has prepared this Semiannual Remedy Selection Progress Report summarizing progress on the selection and design of a groundwater remedy for the Coal Combustion Residuals (CCR) Landfill at the Twin Oaks Power Station (Twin Oaks or Site) located in Robertson, Texas.

The CCR Landfill is subject to regulation under Title 40, Code of Federal Regulations (CFR), Part 257, Subpart D (40 CFR § 257 et seq.), also known as the Federal CCR Rule, and Title 30, Texas Administrative Code (TAC), Chapter 352 (30 TAC § 352 et seq.), also known as the Texas CCR Rule (collectively referred to as the CCR Rules).

This report documents remedy selection activities from completion of the Assessment of Corrective Measures (ACM) Report through 30 June 2026, in accordance with 40 CFR §257.97(a) and 30 TAC §352.971.

1.1 PROGRAM STATUS

The CCR Landfill is currently operating in assessment monitoring, as defined by 40 CFR § 257.95 and 30 TAC § 352.951, following its transition from detection monitoring on 27 April 2023.

In 2024, a statistically significant level (SSL) of selenium above the Groundwater Protection Standards (GWPS) was detected at downgradient compliance well MW-14. In response, Major Oak investigated the nature and extent of selenium in groundwater between 13 January 2025 and 14 March 2025, in accordance with 40 CFR § 257.95(g)(1) and 30 TAC § 352.951(a), which resulted in delineation of the horizontal and vertical extent of the selenium plume near MW-14.

Pursuant to 40 CFR § 257.96(f) and 30 TAC § 352.961(a), Major Oak completed an ACM for the CCR Landfill on 23 July 2025, which proposed the following remedies for evaluation:

- Source Control – Enhance compaction of CCR material during the remaining active life of the landfill to reduce leachate generation and migration.
- Monitored Natural Attenuation Pilot (MNA) Study – Periodic monitoring and implementation of a pilot study to evaluate the effectiveness of source control and natural attenuation processes.

2. SUMMARY OF ACTIVITIES COMPLETED

The following activities were completed between 23 July 2025 and 30 June 2026:

- **Source Control** – Major Oak continues to implement and evaluate enhanced compaction of disposed CCR material, initiated in July 2025, in support of future implementation of enhanced compaction for all CCR material placed in the Landfill. Activities have included development of site-specific placement and compaction procedures, field observation of compaction performance, collection of field density data, and laboratory testing to evaluate the effects of enhanced compaction on material density and permeability.

Results to date are consistent with the objectives of the enhanced compaction program. Field observations and testing indicate that CCR materials can be compacted using a defined, repeatable rolling pattern and placement process.

- **MNA Pilot Study** – Major Oak completed a Site-wide semiannual sampling event in March 2026, and a quarterly sampling event in June 2026. During both events, samples were collected from downgradient compliance well MW-14 and the four selenium test wells installed in 2025 (MW-23, MW-24, MW-25, and MW-26) to further investigate, delineate, and monitor the selenium plume. The selenium test wells are located hydraulically side-gradient and downgradient from MW-14.

During the initial March 2026 event, groundwater samples were collected for laboratory analysis of total selenium, selenite, and selenate. Field parameters measured included dissolved oxygen, total iron, ferrous iron, oxidation-reduction potential, nitrate, nitrite, hydrogen sulfate, and hydrogen sulfide.

Based on these results, the sampling protocol was refined for the June 2026 event to include laboratory analysis of total iron and ferrous iron (in lieu of field measurements), as well as dissolved selenium.

Preliminary data from these events support the conclusions documented in the ACM, indicating that selenium mobility appears to be limited to the eastern edge of the landfill near MW-14.

3. UPCOMING PROJECT ACTIVITIES

The following activities are planned for the second half of 2026:

- **Source Control** – Implementation of the enhanced compaction program will continue, including application of enhanced compaction practices to all future CCR material placed in the Landfill. Field density monitoring and periodic evaluation of placement and compaction practices will be conducted, with adjustments made as necessary to maintain the effectiveness of the enhanced compaction approach.
- **MNA Pilot Study** – Groundwater samples will be collected from MW-14 and the selenium test wells during the Site-wide semiannual event scheduled for September 2026 and the quarterly event scheduled for December 2026. Sampling and analytical methods are expected to be the same as those used in the June 2026 event, although adjustments may be made as needed to support the objectives of the pilot study.

4. PROGRESS IN SELECTING AND DESIGNING A REMEDY

Semiannual and quarterly sampling of MNA and redox parameters have supported evaluation of a potential groundwater remedy by providing additional geochemical and water quality data to further characterize plume conditions and attenuation processes. Data collected to date have allowed for improved understanding of selenium speciation, mobility, and redox conditions near MW-14 and the selenium test wells, informing evaluation of MNA as a potential corrective measure. Monitoring is also being used to assess whether enhanced source control measures are reducing CCR-derived contributions to groundwater. Results appear generally consistent with the remedies proposed in the ACM. Consistent with the approach outlined in the ACM, additional monitoring and continued evaluation of enhanced compaction will be conducted to further assess remedy performance and support selection of final corrective measures.



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